



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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Ref: 8P-AR

Thomas H. Gibbons
Environmental Specialist
Andeavor Field Services, LLC
1801 California Street, Suite 1200
Denver, Colorado 80202

Re: Final Part 71 Operating Permit, Permit #V-UO-000979-2017.00, Andeavor Field Services, LLC, Walker Hollow Compressor Station

Dear Mr. Gibbons:

This is regarding renewal of the 40 CFR part 71 Title V operating permit (Part 71 permit) for Andeavor Field Services, LLC (Andeavor), Walker Hollow Compressor Station. The public comment period for the draft of this permit action ended on May 4, 2018. The EPA received a comment letter from you, representing Andeavor. No other comments were received during the public comment period. We have reviewed the comments and provided responses in "Enclosure 1 – Response to Comments Document." We have made revisions to the permit in response to the comments.

Based on the information provided in Andeavor's Part 71 permit renewal application, subsequent application updates and public comments on the draft permit, the EPA hereby issues the enclosed final renewed Part 71 permit for the Walker Hollow Compressor Station. The new permit number is V-UO-000979-2017.00.

Please review each condition carefully and note any restrictions placed on this source. Procedures for appealing this permit can be found in 40 CFR 71.11(l). A petition to the Environmental Appeals Board (EAB) must be filed within 30 days of receipt of this final permit action. The permit will be effective on July 12, 2018, provided there are no appeals filed with the EAB.

If you have any questions concerning the enclosed final permit, please contact Colin Schwartz, of my staff, at (303) 312-6043.

Sincerely,

MONICA MATHEWS-
MORALES

Digitally signed by MONICA
MATHEWS-MORALES
Date: 2018.06.12 08:04:29 -06'00'

Monica Mathews-Morales
Director, Air Program
Office of Partnerships and Regulatory Assistance

Enclosures (2)

cc: Minnie Grant, Air Coordinator, Energy, Minerals and Air, Ute Indian Tribe
Bruce Pargeets, Director, Energy, Minerals and Air, Ute Indian Tribe (w/o enclosures)

Enclosure 1 – Response to Comments Document

EPA Responses to Comments from Andeavor Field Services, LLC, on the Draft Air Quality Operating Permit and Statement of Basis for the Walker Hollow Compressor Station Pursuant to the Title V Operating Permit Program at 40 CFR Part 71

Comments on Draft Part 71 Permit

1. Table of Contents

“Comment #1: The Table of Contents lists two sections as “III”. The second one, regarding Subpart OOOOa, should be Section IV.”

EPA Response: We have revised the permit to accurately reference the correct section number.

2. III.G. Performance Test Requirements

“Comment #2: This condition states “Subsequent NO_x performance tests shall be conducted on an annual basis and no more than 14 calendar months following the previous performance test.” Please note that 40 CFR §60.4340(a) allows for less frequent performance testing:

‘If the NO_x emission result from the performance test is less than or equal to 75 percent of the NO_x emission limit for the turbine, you may reduce the frequency of subsequent performance tests to once every 2 years (no more than 26 calendar months following the previous performance test).’

Andeavor requests that this biennial testing provision be added to permit Condition III.G.1.’

EPA Response: We have revised the permit to include the biennial testing provisions in §60.4340(a) that apply if the owner or operator is not using water or steam injection when demonstrating continuous compliance with NO_x.

3. IV.A. Applicability

“Comment #3: Unit GT-101 has a dry-seal centrifugal compressor, so it is not affected under Subpart OOOOa. As discussed in the permit application dated September 26, 2017, Section 2.1.2 (Process Description), Section 4.0 (Regulatory Review), and EPA Form 5900-86 (I-COMP), the affected reciprocating compressors at the facility are the two electrically-driven flash gas reciprocating compressors (Ariel model JGP/1: units C-103 and C-104).”

EPA Response: We have revised the Applicability section at IV.A to correctly show that the electrically-driven flash gas reciprocating compressors (units C-103 and C-104) are the affected units under subpart OOOOa.

4. IV.F. Additional Requirements for Initial Compliance for Covers and Closed Vent Systems for Reciprocating Compressors

“Comment #4: Since the reciprocating compressors subject to Subpart OOOOa have neither a cover nor a closed vent system, Condition IV.F can be deleted from the permit since it is not applicable. It is particularly important to exclude non-applicable requirements from the permit. Andeavor is required to submit its annual compliance certification for all permit requirements; certifying of non-applicable requirements is meaningless.”

EPA Response: We have removed this section from the permit because the reciprocating compressors have neither a cover nor a closed vent system.

5. IV.H. Initial and Continuous Cover and Closed Vent System Inspection and Monitoring Requirements for Reciprocating Compressors Affected Facilities

“Comment #5: Since the reciprocating compressors subject to Subpart OOOOa have neither a cover nor a closed vent system, Condition IV.H can be deleted from the permit since it is not applicable. It is particularly important to exclude non-applicable requirements from the permit. Andeavor is required to submit its annual compliance certification for all permit requirements; certifying of non-applicable requirements is meaningless.”

EPA Response: We have removed this section from the permit because the reciprocating compressors have neither a cover nor a closed vent system.

6. IV.J. General Standards

“Comment #6: The draft permit requires reports to be sent to EPA in paper format. EPA’s Compliance and Emissions Data Reporting Interface (CEDRI) currently contains the spreadsheet template for Subpart OOOOa annual reporting but no provision currently exists for CEDRI to collect this report electronically since EPA’s website lists “None” for both “Initial Availability Date” and “Last Update Date” under the heading for “60.5420a(b) Annual Report.” Since there may be several lengthy attachments to the annual report, Andeavor requests that the option to submit the annual report via email (to R8AirReportEnforcement@epa.gov) until such time as CEDRI becomes available for upload of the annual report.”

EPA Response: We have added the option for emailing the reports in Section IV.J General Standards to r8airreportenforcement@epa.gov.

7. V.F. Recordkeeping Requirements

“Comment #7: This condition states “The Permittee shall keep records of the requirements of §63.774(h) when using a control device whose model is tested under §63.772(h) to comply with §§63.771(d), (e)(3)(ii) and (f)(1).” This facility does not use a control device whose model is tested under §63.772(h); therefore, Condition V.F.8 can be deleted from the permit since it is not applicable. It is particularly important to exclude non-applicable requirements from the permit. Andeavor is required to submit its annual compliance certification for all permit requirements; certifying of non-applicable requirements is meaningless.”

“Comment #8: This condition states “The Permittee shall keep records, pursuant to §63.774(i), of the date the semi-annual maintenance inspection required under §63.773(b) is performed when using a control device whose model was tested under §63.772(h).” This facility does not use a control device whose model is tested under §63.772(h); therefore, Condition V.F.9 can be deleted from the permit since it is not applicable. It is particularly important to exclude non-applicable requirements from the permit. Andeavor is required to submit its annual compliance certification for all permit requirements; certifying of non-applicable requirements is meaningless.”

EPA Response: These conditions in the permit do not explicitly state that a control device shall be used that is tested under §63.772(h) and records of that particular use shall be maintained. The conditions state that IF such a device is used, then those records must be kept. Subpart HH provides compliance options that the EPA has included in the Part 71 permit. If we revised the recordkeeping requirements in the permit as requested and the Permittee were to change the method of compliance regarding the control device used and associated testing and monitoring requirements to those in §63.772(h), the permit would need to be re-opened to include the requirements for that compliance option. The Title V operating permit program allows for the inclusion of requirements in the permit that do not apply at the time of permit issuance, in order to reflect the same flexibility in compliance as the applicable requirement allows. As written, the permit provides the option for the Permittee to change compliance method without having to modify the permit. Therefore, these conditions have not been removed.

8. VI.B. Reporting Requirements

“Comment #9: This condition states: ‘The Permittee shall submit to the EPA all reports of any required monitoring under this permit semiannually. The first report shall cover the period from the effective date of this permit through December 31, 2018. Thereafter, the report shall be submitted semi-annually, by April 1st and October 1st of each year. The report due on April 1st shall cover the 6-month period ending on the last day of December before the report is due.’ Please note that depending on the effective date of this permit, which could be prior to July 1, 2018, the first report that is due April 1, 2019, may cover a period longer than 6 months.”

EPA Response: The EPA appreciates the comment and acknowledges that the first report due may cover a period longer than 6 months. The intent of this provision is to ensure that the EPA receives compliance reporting for all periods of time after the effective date of the permit, particularly if the permit is effective prior to the beginning of the 6-month period ending on the last day of December before the first report is due.

Comments on Statement of Basis for Draft Part 71 Permit

1. I.D. Potential to Emit, Table 2

“Comment #1: The PTE total values in Table 2 do not appear to be correct:

- The NO_x total is listed as 40.7 tpy; the sum of values listed is 40.3 tpy.
- The VOC total is listed as 96.3 tpy; the sum of values listed is 93.7 tpy.

- The HAP total is listed as 4.2 tpy; the sum of values listed is 4.9 tpy.”

2. II. Applicable Requirements Review

“Comment #2: I believe it is worth mentioning in the Statement of Basis in a little more detail why both 40 CFR 63 Subpart YYYY (NESHAP for Major Sources: Stationary Combustion Turbines) and Subpart DDDDD (NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters) are not applicable. The facility is a synthetic minor HAP source because there are federally enforceable emission controls under MACT HH that limit HAP emissions to less than major source levels. Consequently, the facility is not a major source of HAP and Subparts YYYY (combustion turbine, unit GT-101) and DDDDD (dehydrator reboiler) do not apply.”

EPA Response to Comments on the Statement of Basis for the Draft Part 71 Permit: We agree that the total PTE for NO_x, VOC and HAP were summed incorrectly. We also agree that compliance with NESHAP subpart HH limit the source’s HAP emissions to less than major source levels for the purposes of determining applicability to the major source provisions of NESHAP subparts YYYY and DDDDD, and that, therefore, that is the reason that those subparts do not apply. There is no Statement of Basis issued with the final permit and we do not make changes to the Statement of Basis for the draft permit. Andeavor Field Services, LLC's comments are a part of the final permit record and any necessary requested corrections to information in the Statement of Basis for the draft permit are, therefore, documented in the permanent permit record in the form of the comments and this response to the comments.